

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al.,

Plaintiffs,

v.

STANLEY TAYLOR, et al.,

Defendants

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)
)
) 05-399-JJF-Civil Action No.
)
)
)

FILED

FEB - 1 2006

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

INTERROGATORIES

To: Commissioner Stanley Taylor, Warden Rick Kearney, Lt. Hollis, Sgt. Mears,
Lt. Hennessy, Deputy Warden Mike Deloy, and Cpl. J. Stozenbach.

COMES NOW the Plaintiffs propounds the following Interrogatories to the
named defendants, subject to the conditions set forth below:

a. These Interrogatories are continuing in charcter, so as to require you
to file supplementary answers if you obtain further or different information
before trial.

b. Where the named or identity of a person is requested, please state full
name, and job title, if known.

c. Unless otherwise indicated, these Interrogatories refer to the time,
place and circumstances of the occurrence mentioned or complained of in the
pleadings.

d. Where knowledge or information in inpossession of a party is requested,
such request includes knowledge of the party's agent, representative and, unless
privileged, his attorneys. When answer is made by corporation defendant, state
the name, address and titled of the person supplying the information,

, e. The pronoun "you" refer to the party to whom these interrogatories are
addressed, and the person mentioned in clause (d).

1. State in your own words the manner in which the incident which forms
the subject matter of this Complaint occured. Include any act or guideline to
establish and supervise programs for the education and training of staff in

equal treatment of inmates, and avoidance in racial discrimination in in regards to disciplinary and classification. If those procedure are set forth in any policy, directive, or other document, produce the document.

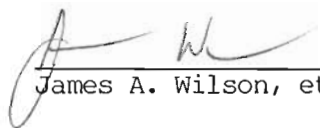
2. State the names, titles, and duties of all staff members at SCI other than defendant Lt. Hollis, who classify inmates in the merit building to higher security and job placement since April 1, 2000.

3. State the procedure in effect during the filing of the Complaint at SCI for the criteria use to select job placement at the prison. If those procedures are set forth in any policy, directive, or other document, produce the document.

4. Named those persons, including the plaintiffs, who have given you written and /or record statements concerning the facts complained of in this action. Please attach copies of their written statements to these Answer to Interrogatories.

DATED:

1/29/06


James A. Wilson, et al

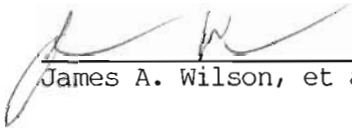
CERTIFICATE OF SERVICE

I, JAMES A. WILSON, hereby certify that on JAN 29, 2006
plaintiffs forward the the document(s) to be mailed to the following: by placing
in the SCI prison mailbox to be mailed to:

Attorney General Office
Department of justice
Carvel Office Building
820 N. French Street
Wilmington, DE 19801

Attorneys for state defendants

DATED: 1/29/06


James A. Wilson, et al

I/M: JAMES A. WILSON, III, BLVD, MERIT/EAST
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19947



UNITED STATES DISTRICT COURT

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WILM, DE. 19801-3570